

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Amateur Radio)	
Service Rules to Provide for a New)	
Entry Level Amateur Radio Class.)	RM-10870
)	
)	
To: The Commission)	

COMMENTS TO THE PETITION

I concur with the above referenced petition (“the Petition”) filed by the National Conference of Volunteer Examiner Coordinators (“NCVEC”) in all respects.

I joined the ranks of Amateur Radio licensees with a Novice license in 1959, and have been licensed continuously since that time. I have held an Amateur Extra Class operator license since August of 1976. I also held a FCC First Class Radiotelephone license with endorsements from 1962 until all such licenses were converted to a “General Radiotelephone Operators License” - which I still hold.

My comments will address primarily some issues brought up by other individuals, as well as some points concerning the petition as filed.

Many respondents have expressed the opinion that using automatic upgrades to advance some licensees in grade is wrong, and will bring great disaster to the Amateur Radio service. The primary complaint seems to be that this would result in those licensees being able to access modes and operating privileges for which they had not been tested. I submit that this is not a valid reason to find against the petition. The fact of the matter is that virtually every Amateur licensee, if they have been licensed more than a few years, is allowed to operate using modes, frequency assignments, and operating privileges for which they were never asked to demonstrate their knowledge or skill. For example, no licensee who received their license on or before 1991, and who has not since upgraded, has been examined on RF safety issues. In a similar manner, band allocations, modes, and many other items that are part of today’s examinations were not a part of older tests. The argument that because a person has not been tested on some point, they should not be upgraded, is as wrong as the opposite viewpoint, that every ham should

be retested each time new frequency or mode issues are incorporated into the rules. The simple fact is that on the air experience is the best teacher of all, and a Technician licensee with 10 years of on-air experience is probably better equipped to be a General licensee than a person who has passed Elements 1, 2, and 3 within the last few weeks.

Other respondents are objecting to the concept of using only commercially manufactured equipment (or commercially prepared kits), and state that this is contrary to the traditions of Amateur Radio. The petition clearly states that: "The reason for this provision is to prevent, as much as possible, spurious emissions from units lacking proper engineering design. We realize that this leaves out one of the traditions of Amateur Radio, namely that of building your own station from "scratch." However, we note that technically inclined persons are likely to upgrade fairly quickly to a General Class license, where this restriction, is no longer an issue." The use of commercially manufactured equipment is the norm in the Amateur Radio arena today. I see no merit in the assertion that requiring the use of only commercially manufactured apparatus (or kits) will somehow prevent newcomers from acquiring the skills needed to be a useful and productive Amateur Radio licensee. As the petition clearly states, once a person upgrades to either a General or Extra class license, the restriction disappears. That sounds like another incentive to upgrade, to me.

Still other respondents object to the concept of complete removal of Morse testing from the Amateur Radio licensing structure, and see the petition as endorsing a complete ban on the use of Morse Code. One wonders if these people have even read the petition. The petition clearly states: "We are not suggesting in any way that Morse code (also known as CW) be prohibited, and in fact, we encourage those with an interest in this mode to become proficient in its use." If these new amateurs become interested in exploring the aspects of moon-bounce, QRP (low power), or VHF weak-signal operations, they will find they have a need for Morse skills, and will learn them. Also, do not forget that these new licensees will have access to the exclusive Morse segments of the various HF bands. There will be no prohibition on their listening, learning, and eventually joining those already using these segments. It is entirely possible (and credible) that more, not less, Morse activity will result. As a volunteer examiner, I see persons every day that express interest in learning Morse Code not because they have to, but because they want to.

The fact is, this petition is mostly about providing a new entry level license, and presents a way to accomplish this task with minimal impact on the FCC and in such a way that every current licensee gains something. The assertion that “children can pass the current Technician exam” is undoubtedly correct, but not all children, and not even all adults, are so blessed. What the petition seeks to do is return to the concept of a simplified exam that would be similar in many ways to the original Novice license. The assertion that the current Technician requirements are too complex for use as an entry level license is correct. Again, excerpting from the petition: “The original Novice permit was a one-year, non-renewable license. The examination was 20 questions, and was based on literally 4 pages of question and answer type text”, and “the study materials for the current (Technician) entry level license consist of 166 pages of text, covering 10 subject areas, plus another 80 pages of pool questions and answers, plus several additional pages of appendix, including several charts and graphs, a glossary and more. It's no wonder that potential applicants become discouraged. They are presented with study materials that are ... more than 60 times the complexity of the original Novice license”.

Ed Hare, the ARRL engineer that has been so much in the news of late concerning BPL interference, has perhaps best summed up the situation. In a discussion concerning whether or not a 20 question exam was appropriate for an entry level license, he wrote:

“Funny you should quote 20 questions. In 1963, the Novice exam I took had 20 questions. The ARRL study guide material for the Novice exam was less than 4 pages. There were no questions on antennas, feed lines, propagation or most of the other subjects that the present "entry-level" exams encompass.

I entered ham radio under the most dumbed-down system I could possibly imagine, and I am 100% sure that if someone handed me a Now You're Talking -- a 200+ page study guide -- and told me that I had to learn this or take a hike, I would have taken a hike.

Do you think that amateur radio would be better off if I, and tens of thousands like me who entered ham radio under that simple Novice program, had all been told to take a hike? I would like to think that I have brought some value to amateur radio.

73,
Ed Hare, W1RFI”

SUMMARY

I favor adopting this petition as being the best of the several alternatives now before the FCC on these issues. There appear to be no significant impediments to adopting this petition in its entirety, and urge the commission to do so at the earliest opportunity.

Respectfully submitted,

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